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Attorneys for Defendant  
ROADSAFE TRAFFIC SYSTEMS, INC.

**UNITED STATES DISTRICT COURT**

**EASTERN DISTRICT OF CALIFORNIA - SACRAMENTO**

ADRIANA MAGDALENA RAMOS,  
individually and on behalf of all others similarly  
situated,

Plaintiff,

vs.

ROADSAFE TRAFFIC SYSTEMS, INC.; and  
DOES 1 through 20, inclusive,

Defendants.

Case No. 2:23-CV-02085-KJM-CKD

**JOINT STIPULATION TO STAY ALL  
PROCEEDINGS PENDING MEDIATION  
AND ORDER**

Action Filed: 2/8/2023  
Removal Filed: 9/22/23  
Trial Date: None Set

1           **TO THE CLERK OF THE UNITED STATES DISTRICT COURT FOR THE**  
2 **EASTERN DISTRICT OF CALIFORNIA, DEFENDANT ROADSAFE TRAFFIC**  
3 **SYSTEMS, INC., AND TO ITS COUNSEL OF RECORD:**

4           **WHEREAS** Plaintiff ADRIANA MAGDALENA RAMOS (“Plaintiff”) filed this civil class  
5 action for damages against Defendant ROADSAFE TRAFFIC SYSTEMS, INC. (“Defendant”)  
6 (collectively, the “Parties”) on February 8, 2023;

7           **WHEREAS** Defendant removed this civil class action to federal court on September 22,  
8 2023;

9           **WHEREAS** Plaintiff filed and the Parties have fully briefed Plaintiff’s Motion to Remand  
10 this civil class action to state court, which is set to be heard on December 8, 2023.

11           **WHEREAS** Defendant filed and the Parties have fully briefed a Motion to Dismiss  
12 Plaintiff’s First Amended Class Action Complaint, which is set to be heard on December 8, 2023.

13           **WHEREAS** the Parties to this Action agreed to mediate this matter with experienced  
14 mediator, the Hon. Carl J. West (Ret.), on January 23, 2024 (the “Mediation Date”), the earliest date  
15 on which the mediator is available.

16           **WHEREAS** the Parties desire to devote their resources to focus on potentially resolving this  
17 matter in full at the mediation, and therefore, the Parties jointly request the Court to stay all  
18 proceedings until after the Mediation Date. Courts have “broad discretion” to stay proceedings.  
19 *Clinton v. Jones*, 520 U.S. 681, 706 (1997). “[T]he power to stay proceedings is incidental to the  
20 power inherent in every court to control the disposition of the causes on its docket with economy of  
21 time and effort for itself, for counsel, and for litigants.” *Landis v. North Am. Co.*, 299 U.S. 248, 254  
22 (1936); see also Fed. R. Civ. P. 1. The Parties agree that a stay will help secure the just and efficient  
23 resolution of this proceeding.

24           **NOW THEREFORE IT IS HEREBY STIPULATED THAT:**

- 25           1. All proceedings in this matter (including the hearings on Defendant’s Motion to Dismiss  
26 and Plaintiff’s Motion to Remand) be stayed in full until after the Mediation Date, to  
27 provide the Parties with adequate time to resolve all issues on or shortly after the  
28 Mediation Date. The Parties jointly request that the Court schedule a status conference at

1 least thirty (30) days after the Mediation Date of January 23, 2024.

- 2 2. The Parties jointly request the Court to preserve their respective rights in this action,  
3 including any arguments in support of or defenses against Defendant's right to challenge  
4 the pleadings and Plaintiff's right to file a remand motion.
- 5 3. All discovery shall be stayed during the period of the stay. The Parties have entered into  
6 a detailed, written agreement on the dates and content of the informal, pre-mediation  
7 exchange of data and documents necessary to conduct mediation.

8  
9 **IT IS SO STIPULATED.**

10  
11 DATED: November 21, 2023

AEGIS LAW FIRM, PC

12  
13 By: /s/ Alex J. Valle

Samuel A. Wong  
Kashif Haque  
Jessica L. Campbell  
Alex J. Valle

14  
15  
16 Attorneys for Plaintiff  
ADRIANA MAGDALENA RAMOS

17  
18 DATED: November 21, 2023

OGLETREE, DEAKINS, NASH,  
SMOAK & STEWART, P.C.

19  
20 By: /s/ Paul M. Smith

Michael J. Nader  
Alexandra Asterlin  
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23 Attorneys for Defendant  
ROADSAFE TRAFFIC SYSTEMS, INC.

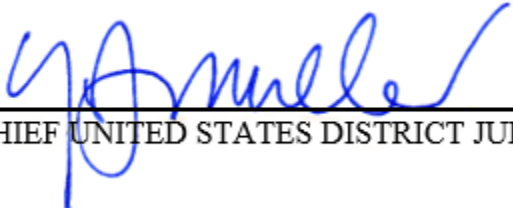
**ORDER**

**THIS COURT**, having read and considered the Joint Stipulation to Stay All Proceedings Pending Mediation by, between and among Plaintiff ADRIANA MAGDALENA RAMOS and Defendant ROADSAFE TRAFFIC SYSTEMS, INC, and finding good cause therefor, orders as follows:

1. This action is stayed in its entirety, subject to the conditions set forth in the Parties' stipulation, until the Court convenes a status conference by videoconference on **March 14, 2024 at 2:30 p.m.** before the undersigned.
2. All other dates currently pending and/or scheduled in this action are vacated and continued until after the status conference.

**IT IS SO ORDERED.**

DATED: November 27, 2023.

  
CHIEF UNITED STATES DISTRICT JUDGE